

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

JOHN L. STINSON, JR., SHARIKA)	
HORTON, NATHANIEL RAY)	
JOHNSON, HELEN MARIE)	
SCHLUETER, individually and)	CIVIL ACTION NO.
behalf of other similarly situated)	1:22-cv-01342-TWT
individuals,)	
)	
Plaintiffs,)	
)	
v.)	
)	
LOCKHEED MARTIN)	
CORPORATION)	
)	
Defendant.)	

**STIPULATION TO
CONDITIONAL CERTIFICATION**

Plaintiffs John L. Stinson, Jr., Sharika Horton, Nathaniel Ray Johnson, Helen Marie Schlueter (“Plaintiffs”) and Defendant Lockheed Martin Company (“Defendant”) (collectively, “the Parties”), file this Stipulation to Conditional Certification of this action pursuant to Section 216(b) of the Fair Labor Standards Act, which asserts that “[a]n action to recover the liability [in an FLSA action] may be maintained against any employer...by any one or more employees for and in behalf of himself or themselves and other employees similarly situated.”

The Parties have agreed to the following stipulations:

I. CONDITIONAL CERTIFICATION

1. The collective shall be defined as: “Current and former Fire Fighters that worked for Lockheed Martin Corporation at either the Marietta, Georgia or Fort Worth, Texas location at some time during the period beginning three years prior to the date of conditional certification to the present, who had fire suppression duties as a job function. With respect to individuals that have already filed a Consent to Join this action, they shall be considered part of the collective if they worked as a current or former Fire Fighters that worked for Lockheed Martin Corporation at either the Marietta, Georgia or Fort Worth, Texas location at some time during the period beginning three years prior to the filing of his/her consent to join, who had fire suppression duties as a job function.”
2. Plaintiffs John L. Stinson, Jr., Sharika Horton, Nathaniel Ray Johnson, Helen Marie Schlueter shall serve as the collective action representatives.
3. This stipulation to conditional certification shall not affect Defendant’s right to subsequently seek decertification of the conditionally certified action, nor shall it act as any admission by Defendant that the proposed collective members are “similarly situated” as it relates to any motion for decertification of the action.

II. COURT-AUTHORIZED NOTICE

4. Notification will be made to all potential opt-in plaintiffs as described above by sending the Notice of Collective Action Lawsuit attached as Exhibit 2 to the Parties' Joint Motion to Conditionally Certify Action and Approve Collective Action Notice.
5. Counsel for Defendant shall provide a list, which list shall include the name, last known mailing address, and personal e-mail address (if known) of each former or current employee of Defendant meeting the definition of the proposed collective, to Plaintiff's counsel no later than twenty-one (21) days following the date of the Court's Order granting conditional certification.
6. Counsel for Plaintiff shall bear the cost of issuing the attached Notice to all potential opt-in plaintiffs identified by Defendant via U.S. mail, certified mail and/or e-mail.
7. Individuals receiving the Notice shall have seventy-five (75) days from the date the Notice is postmarked or sent via e-mail ("Notice Period") to opt into the lawsuit by returning their consent form to Plaintiff's Counsel.
8. Plaintiff's counsel shall file all signed Consents to Join no later than seven (7) days following the close of the Notice Period.

Respectfully submitted this 7th day of November, 2022.

/s/Douglas R. Kertscher

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